

**REMARKS**

The Examiner rejected claims 1-20 under 35 U.S.C. §102(b) as allegedly being anticipated by Tyan et al. (U.S. Patent No. 5,893,127).

Applicants respectfully traverse the §102(b) rejections with the following arguments.

**35 U.S.C. §102(b)**

The Examiner rejected claims 1-20 under 35 U.S.C. §102(b) as allegedly being anticipated by Tyan et al. (U.S. Patent No. 5,893,127).

Since claims claims 1-2, 7-8, 12-13, and 18-20 have been canceled, the rejection of claims claims 1-2, 7-8, 12-13, and 18-20 is moot.

**Claims 3-6, 9-11, and 14-20**

Applicants respectfully contend that Tyan does not anticipate claims 3-6, 9-11, and 14-17, because Tyan does not teach each and every feature of claims 3-6, 9-11, and 14-17. For example, Tyan does not teach the following feature of claims 3-6, 9-11, and 14-17: "combining a first x coordinate and a second x coordinate for each screen display object of a plurality of screen display objects, to provide a set of x coordinates".

The Examiner argues that Tyan, col. 12, line 65 - col. 13, line 5 teaches the preceding feature of claims 3-6, 9-11, and 14-17 by reciting: "The row span number is determined to be the number of horizontal grandchildren plus one. The block to which the row span number is assigned is selected to be the first non-vertical child, or the first grandchild that does not have a horizontal sibling. If a grouping is selected to be assigned the column span number or the row span number, the assignment passes to the first block in that grouping."

In response, Applicants maintain that Tyan, col. 12, line 65 - col. 13, line 5 teaches calculation of row span which is not a teaching of the preceding feature of claims 3-6, 9-11, and 14-17. At issue is the concept of a "set of x coordinates". Claims 3-6, 9-11, and 14-17 are using the term "set" in the manner that "set" is used in logic and mathematics. Formally, a "set" is "a

prescribed collection of points, numbers, or other objects that satisfy a given condition” (*Webster's New World Dictionary* 1228 (3d ed. 1988)). The website “<http://www.intermath-uga.gatech.edu/dictionary/descript.asp?termID=327>” similarly defines “set” as “a collection of numbers, geometric figures, letters, or other objects that have some characteristic in common”.

Thus, a set of x coordinates is a prescribed collection of numbers that satisfy a given condition of being x coordinates. Applicants’ specification, page 5, line 16 provides an example of a set of x coordinates as (0, 2, 4, 7, 11).

A set cannot include elements (e.g., numbers, etc.) that do not satisfy the given condition. For example, (1, 2, 7.77, 4, 8.88, 9) cannot be set of integers, because of the presence of non-integers therein. In other words, the elements of a set must be a “prescribed collection” and must satisfy the given condition (or have the characteristic in common).

In application to Tyan, Applicants cannot find any teaching in Tyan of “combining a first x coordinate and a second x coordinate for each screen display object of a plurality of screen display objects, to provide a set of x coordinates”. Applicants cannot even find a teaching of a set of x coordinates in Tyan, since a set is a particular type of collection of objects which Tyan does not disclose for object being x coordinates. Applicants respectfully request the Examiner to explain with particularity where and how Tyan teaches the preceding feature of claims 3-6, 9-11, and 14-17.

In particular, Applicants cannot find in Tyan, col. 12, line 65 - col. 13, line 5 a teaching of combining a first and second x coordinate to provide a set of x coordinates. Therefore, Applicants respectfully request the Examiner to explain with particularity how Tyan, col. 12, line

65 - col. 13, line 5 teaches combining a first and second x coordinate to provide a set of x coordinates.

Similarly, Applicants respectfully contend that Tyan does not teach the following feature of claims 3-6, 9-11, and 14-17: "combining a first y coordinate and a second y coordinate for each screen display object of the plurality of screen display objects, to provide a set of y coordinates".

Based on the preceding arguments, Applicants respectfully maintain that Tyan does not anticipate claims 3-6, 9-11, and 14-17, and that claims 3-6, 9-11, and 14-17 are in condition for allowance.

Next, Applicants present the following additional arguments in relation to claims 4-6, 9-11, and 13-17.

#### Claim 4

Applicants respectfully contend that Tyan does not teach the following feature of claim 4: "for each screen display object of a plurality of screen display objects, determining a plurality of **Cartesian coordinate pairs** that specify a location of the screen display object" (emphasis added).

The Examiner argues that Tyan, col. 4, lines 41-46 teaches the preceding feature of claim 4 by reciting: "Based on the layout relationships, a block type is determined for each block, column span and row span for each block is determined, blocks are reordered if needed, and an HTML file is generated based on block type and column and row span information for the blocks."

In response, Applicants maintain that the disclosure in Tyan, col. 4, lines 41-46 relates only column span and row span, which pertain to column and row intervals and does not disclose **Cartesian coordinate pairs** that specify a location.

In "Response To Arguments", the Examiner cites and discusses the Table in Tyan col. 9, line 63 - col. 10, line 23. In response, Applicants respectfully maintain that said Table does not disclose **Cartesian coordinate pairs** that specify a location, but instead discloses a single coordinate (and not a pair of coordinates), namely left (l), right (r), top (t), and (bottom (b). Applicants acknowledge that the array of l,r,t,b will specify a location of a block. However the array l,r,t,b is not organized in the form of Cartesian pairs as required by claim 4.

Based on the preceding arguments, Applicants respectfully maintain that Tyan does not anticipate claim 4, and that claim 4 is in condition for allowance.

#### Claim 5

Applicants respectfully contend that Tyan does not anticipate claim 5, because Tyan does not teach each and every feature of claim 5. For example, Tyan does not teach the following feature of claim 5: "creating an HTML table having rows and columns, wherin column widths are determined by differences between **consecutive elements** of the set of x coordinates" (emphasis added).

The Examiner argues that Tyan, col. 13, lines 54-60 teaches the preceding feature of claim 5 by reciting: "Step S509 will now be discussed with reference to FIG. 11B. As shown in FIG. 11B, two general situations might occur in which the block order obtained in step 5505 will have to be rearranged to accommodate the way HTML processes table data (i.e., down row by

row, in sequence). In each, a row span block is to the right of and horizontally adjacent to a column span block..”

In response, Applicants maintain that the disclosure in Tyan, col. 13, lines 54-60 relates only to the determination of block order and is irrelevant to the preceding feature of claim 5, as explained in the example of Tyan, col. 13, lines 61-67 and Tyan, col. 14, lines 1-7.

In “Response To Arguments”, the Examiner cites and discusses Tyan, col. 11, lines 3-10 and 17-26. In response, Applicants respectfully maintain that there is no mention of consecutive elements of the set of x coordinates in Tyan, col. 11, lines 3-10 and 17-26. Moreover, the Examiner makes the following assumption that the Examiner has alleged but has not supported with evidence: “The examiner interprets that Tyan is testing to see if the vertical and horizontal layout of the blocks, that system is determining the widths and heights of the blocks between each other.”

Based on the preceding arguments, Applicants respectfully maintain that Tyan does not anticipate claim 5, and that claim 5 is in condition for allowance.

#### Claims 6 and 9-11

Applicants respectfully contend that Tyan does not teach the following feature of claims 6 and 9-11: “including an x coordinate of an origin in the set of x coordinates”.

The Examiner argues that Tyan, col. 12, line 65 - col. 13, line 5 teaches the preceding feature of claims 6 and 9-11 by reciting: “The row span number is determined to be the number of horizontal grandchildren plus one. The block to which the row span number is assigned is selected to be the first non-vertical child, or the first grandchild that does not have a horizontal

sibling. If a grouping is selected to be assigned the column span number or the row span number, the assignment passes to the first block in that grouping."

In response, Applicants maintain that Tyan, col. 12, line 65 - col. 13, line 5 does not disclose anything pertaining to "including an x coordinate of an origin in the set of x coordinates".

In "Response To Arguments", the Examiner argues: "The reference inherently teaches that when a coordinate system is used for indicating objects layout, the origin is the starting point in the coordinates system. The starting point may be located anywhere on the system. The origin is also indicated as being 0 for x, and 0 for y, and 0 for z (3-D). In Tyan, coordinate location points are illustrated in the table in col. 9 line 63 - col. 10 line 20. This illustrates the coordinate points, with respect to the origin is the starting point for all the points. Meaning, proper location of the blocks can be placed in relation to the origin. The origin is used in a coordinate system to reference to the height and width of points."

In response, Applicants acknowledge that Tyan's method must utilize an origin of coordinates. However, Tyan does not teach that the x coordinate origin is included specifically in the set of x coordinates, as required by claims 6 and 9-11. Moreover, Applicants respectfully contend that the cited table in col. 9 line 63 - col. 10 line 20 is merely a listing of rectangular blocks and the location of each block, but the x origin of coordinates does not explicitly appear in said cited table.

Similarly, Applicants respectfully contend that Tyan does not teach the following feature of claim 6: "including a y coordinate of the origin in the set of y coordinates".

Based on the preceding arguments, Applicants respectfully maintain that Tyan does not

anticipate claims 6 and 9-11, and that claims 6 and 9-11 are in condition for allowance.

Claims 14-17

Applicants respectfully contend that Tyan does not teach the following feature of claims 14-17: "wherein said creating step comprises creating the HTML table such that the number of rows is equal to the number of elements in the set of y coordinates and the number of columns is equal to the number of elements in the set of x coordinates".

The Examiner argues: "Tyan discloses the HTML table such that the number of rows is equal to the number of elements in the set of y coordinates and the number of columns is equal to the number of elements in the set of x coordinates (col. 12 lines 45-57)."

In response, Applicants maintain that Tyan, col. 12, lines 45-57 does not mention the set of x coordinates or the set of y coordinates, and does not mention the number of elements in the set of x coordinates and the set of y coordinates. Tyan, col. 12, lines 45-57 most certainly does not disclose that the number of rows and columns are respectively equal to the number of elements in the set of x coordinates and the set of y coordinates.

Based on the preceding arguments, Applicants respectfully maintain that Tyan does not anticipate claims 14-17, and that claims 14-17 are in condition for allowance.

**CONCLUSION**

Based on the preceding arguments, Applicants respectfully believe that all pending claims and the entire application meet the acceptance criteria for allowance and therefore request favorable action. If the Examiner believes that anything further would be helpful to place the application in better condition for allowance, Applicants invites the Examiner to contact Applicants' representative at the telephone number listed below. The Director is hereby authorized to charge and/or credit Deposit Account No. 09-0457.

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